May 20, 2013

Mr. John Murray
North Carolina Department of Environment and Natural Resources
Division of Waste Management – Solid Waste Section
610 East Center Street, Suite 301
Mooresville, North Carolina 28115

Subject: **Revised Operations Manual and Construction Certification**
Todco, Inc. Facility
1123 Roy Lopp Road
Lexington, Davidson County, North Carolina
Permit No. 2908-Transfer-2013

Dear Mr. Murray:

As authorized, ***Blue Ridge Geological Services, Inc. (Blue Ridge)*** assisted Todco, Inc. personnel in revising the operations plan and performing oversight of the construction of the construction and demolition transfer, treatment, and processing facility at the subject site. A copy of the revised operations manual is attached. The subject facility was constructed in general accordance with the permit application, operations and maintenance manual, approved plans, permit to construct, and correspondence with NCDENR officials. If you have any questions concerning this letter or the site, please contact Jeff Gerlock at 336-431-5454.

Sincerely,

Jeffrey L. Gerlock, L.G.
NC Licensed Geologist #1141

P. Greg Garrett, P.E.
NC Professional Engineer #021591

Attachment

Cc: Todd Warfford, Todco, Inc.

May 2013

Mr. John Murray
North Carolina Department of Environment and Natural Resources
Division of Waste Management – Solid Waste Section
Composting & Land Application Branch
610 East Center Street, Suite 301
Mooresville, North Carolina 28115

Subject: **Operations Manual**
Todco, Inc. Facility
1123 Roy Lopp Road
Lexington, Davidson County, North Carolina
Permit No. 2908-Transfer-2013

Dear Mr. Murray:

As authorized, ***Blue Ridge Geological Services, Inc. (Blue Ridge)*** assisted Todco, Inc. personnel in preparing the revised operations manual for the subject site. If you have any questions concerning this manual or site operations, please contact Jeff Gerlock at 336-431-5454.

Sincerely,

Jeffrey L. Gerlock, L.G.
NC Licensed Geologist #1141

P. Greg Garrett, P.E.
NC Professional Engineer #021591

Attachments

Cc: Todd Warfford, Todco, Inc.

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1.0 GENERAL FACILITY INFORMATION

Information concerning general facility information is provided below.

1.1 Overview

This operations manual was prepared for operations of the Todco, Inc. (Todco) facility located at 1123 Roy Lopp Road in Lexington, Davidson County, North Carolina (Figures 1 through 3). The facility currently operates under North Carolina Department of Environment and Natural Resources (NCDENR) Division of Solid Waste Management (DWM) Permit No. 2908-TP. The facility has been designed to accept wood recycling materials and construction and demolition (C&D) materials. This document discusses the operation of the subject facility. Best Disposal, Inc. (a wholly owned subsidiary of Todco, Inc.), a waste container and hauling company, also operates from this site.

1.2 Contact Information

All personnel involved in the management or supervision of the facility shall review and update this manual as necessary. A copy of the Operations Manual is maintained at the facility and is available for review and use at all times. All correspondence and questions regarding the operation of the facility should be directed to the following contact.

Todco, Inc (Operator)
1123 Roy Lopp Road
Lexington, North Carolina 27292
Phone –336-248-2001 Office; 336-240-2219 Mobile
Contact – Todd Warfford, President
Email – todd@todcoinc.com

1.3 Facility Operating Hours

The facility is open Monday through Saturday from 7:30 am to 4:30 pm. During the winter, the facility is open Monday through Friday from 7:30 am to 4:30 pm and Saturday from 7:30 am to 12:30 pm.

1.4 Access Control

A gate along Roy Lopp Road restricts access to the property. The gate is locked during non-operating hours. Inspections of gates and property lines are performed regularly. Access to the processing and storage areas of the facility are controlled by a combination of fences, gates, natural barriers, on-site workers, and strictly enforced operating hours. An attendant is on duty when the facility is open for public use to enforce access restrictions. Best Disposal, Inc. operates trucks which transport waste to the site. In addition, private and commercial vehicles transport waste to the site. Vehicles entering the site pass through a scale and weigh house where the vehicle weight is checked before and after dumping waste on the property. The general traffic flow pattern at the site is illustrated on Figure 3. A fee is charged to each vehicle depositing waste at the site. A receipt is provided to the vehicle driver which shows the weight of the waste deposited and the fee charged. C&D waste will be inspected upon unloading. Unacceptable materials will be loaded back into the vehicle that hauled them.

1.5 Signage

A sign is located at the facility entrance. The sign provides facility information including facility name, permit number, operating hours, and phone number. Roads are clearly marked and barriers such as traffic cones will be placed around the facility as needed.

1.6 Personnel

The following personnel will perform the operation and maintenance of the facility:

President and office staff, maintenance supervisor – overall administrative management of the facility
Scale house attendant – receive and weigh incoming loads, prepare paperwork documenting each load, perform preliminary screening of load contents for unacceptable materials
Loader Operators – supervise the unloading, screen for unacceptable materials, manage and segregate delivered materials
Maintenance and General Labor – perform general labor around the site, perform vehicle and equipment maintenance
Drivers – pick up materials at source (preliminary screen for unacceptable materials), transfer the materials to and from subject facility

A copy of an organizational chart is presented in the Appendix. One member of the supervisory staff trained in facility operations will be on site at all times and during all operating hours. Each employee will participate in an annual training course led by supervisory staff. The training will inform personnel on how to recognize loads that contain unacceptable or prohibited waste.

1.7 Health and Safety

The subject facility has a health and safety program designed to protect the health and safety of the staff, customers, and neighbors. The site Operations Manager is also the site health and safety officer. The operations manager along with facility management personnel modify the site health and safety program consistent with the National Solid Waste Management Association and the Occupational Safety and Health Administration (OSHA) guidelines. Employees participate in regular safety meetings and an annual health and safety meetings led by on-site supervisors. Training programs are documented.

Site personnel wear and use safety equipment during their work including hard hats, safety shoes/boots, gloves, hearing protection, and first aid kits. Processing equipment contains guards and protection from moving parts, electrical connections, and sharp objects. Automated and manual shut off controls are provided on site machinery. Safety equipment on mobile equipment include protective cabs, seat belts, and audible reverse warning devices. Personal protective equipment will be worn based on employees' duties.

1.8 Communications

The scale house and office in the maintenance building have telephones to conduct day to day business and in case of an emergency. Scale house and office personnel communicate with on site workers with radios and telephones. Emergency numbers are posted in the scale house and maintenance office. Fires and non conforming waste incidents will be reported to the Regional Waste Management Specialist within 24 hours followed by a written notification within 15 days.

1.9 Utilities

Electrical power, water, telephone, and restrooms are provided at the scale house and office. Water is also available at the processing areas.

1.10 Litter Control

Scale house personnel and site operators inspect materials entering the facility. If unacceptable materials are delivered to the facility, the operators will deny the load or unacceptable materials will be returned on the same truck. The woods around the perimeter of the property act as a barrier to keep litter contained within the site. Windblown materials will be collected and placed into a trash receptacle to ensure that the litter does not leave the facility boundary. De minimus litter sorted out during processing will be placed into an on-site container for delivery to an approved disposal facility.

1.11 Fire Prevention

Smoking is limited to areas away from the processing line and the storage of processed materials. Fire lane(s) will be maintained and passable at all times. Fire suppression equipment including a 1,100-gallon fire truck and water hoses is provided to control accidental fires. Arrangements have been made with the Holly Grove Volunteer Fire Department to ensure that any incident will be handled with the appropriate equipment.

1.12 Severe Weather Conditions

In the event of extreme weather (e.g., severe storms, heavy snow and ice, etc.), facility operations are either discontinued until the weather passes or modified to utilize existing mobile equipment and auxiliary power. The mobile tub grinder can replace the hog grinder for temporary operations during power outages, and portable generators are available on site for other power needs (scale, scale house, etc.). The facility's heavy equipment is used to clear on-site roads of snow and debris. Excess on-site storage capacity is available for temporary storage of incoming feedstocks during periods of compromised material processing or feedstock surges during storm damage.

1.13 Record Keeping Program

Records are kept at the site regarding wastes received and wastes processed and sold (i.e., pine bark, mulch, soil conditioner, boiler fuel, etc.). Records include customer or vendor name and address, type and weight of material received and sold, waste origin county, and date of transaction. Incoming C&D waste loads will be randomly inspected. A minimum of 1% of incoming loads and a minimum of one load per week of C&D waste will be inspected. Information to be gathered includes date, inspector name,

truck no/hauler, generation site location/name, description of waste, and decision on waste acceptance. The inspection information will be documented on the Inspection / Screening form in the Appendix.

An annual report will be prepared each year for the period July 1 through June 3and submitted to the Division of Waste Management by August 1. The annual report includes the facility name, address, and permit number and the report documents the total quantities and types of waste received, including waste received from local governments, and the quantities of product produced and sold. A blank copy of a Facility Annual Report form is included in the Appendix.

1.14 Financial Assurance

A closure cost estimate equal to the cost to hire a third party to remove and clean up a week's worth of waste from the facility is provided below. A letter of credit in this amount is held at the Bank of North Carolina for financial assurance. A copy of the letter is presented in the Appendix.

Closure Cost Estimate

Assumptions:

- One week of waste cleanup equals a maximum of 26,000 tons per year/260 work days = 100 tons per day or 500 tons per week
- 500 tons divided by 10 tons per load = 50 loads
- Cost to load and transport each load is $10 per ton
- Cost to dispose of each load is $36 per ton
- Cost to cleanup area = 24 man hours @ $15 per hour = $360, plus

  24 man hours @$30 per hour = $720

Summary of Costs:

Disposal Cost	500 tons x $36 per ton = $18,000
Load and Transport Costs:	500 tons x $10 per ton = $5,000
Clean up and broom floor costs:	$360 + $720 = $1,080
Total Estimated Cost of Closure:	**$24,080**

The amount is greater than the total acreage of the C&D processing area (0.5 acre) multiplied by $13,000 or $6,500 (from Admin Code 3745-400-13).

2.0 DEBRIS HANDLING OPERATIONS

Todco currently receives various wood waste products and yard waste. Wood waste includes pallets, furniture waste, chipboard, dimension lumber, etc. Five percent or less of the wood waste received is treated lumber or painted lumber. Approximately one percent of the wood waste received is chipboard. The remaining wood waste is composed of pallets, furniture, and dimensional lumber. Yard waste includes tree limbs, brush, stumps, and land clearing debris. Todco receives a minimum of three tons per day of wood and yard waste and a maximum of approximately 12 tons per day. The annual average amount of wood/yard waste material received is around 8 to 10 tons per day.

Todco will begin accepting waste products from construction sources via roll-off containers owned and managed by Best Disposal and other approved transporters. Todco will periodically accept debris from demolition projects.

2.1 Prohibited Waste

The following wastes will not be accepted:

- Containers such as tubes, drums, barrels, tanks, cans, and bottles unless they are empty and perforated to ensure that no liquid, hazardous, or municipal solid wastes is contained therein.
- Garbage
- Hazardous substances / wastes
- Asbestos-containing materials / wastes
- Industrial solid waste
- Liquid wastes
- Medical waste
- Municipal solid waste
- PCB wastes
- Radioactive waste
- Waste treatment septage or sludge
- White goods

- Yard trash
- Light bulbs of any kind
- Electrical transformers
- Creosote or copper chrome arsenate (CCA) treated wood

2.2 Debris Screening Program

Todco will implement a waste screening plan to ensure that prohibited wastes are not accepted at the site. Todco will provide training on an annual basis for drivers, scale operators, and sorting/processing personnel to identify excluded waste types. New employees will receive training upon commencement of employment. Training will focus on identification of excluded wastes, inspection procedures, and contingency plans to ensure proper management of wastes. Todco personnel will inspect containers of C&D waste when it arrives on site. A responsible individual trained and certified in facility operations will be on-site at all times during all operating hours of the facility. Incoming C&D waste loads will be randomly inspected. A minimum of 1% of incoming loads / minimum of one load per week of C&D waste will be inspected. Information to be gathered includes date, inspector name, truck no/hauler, generation site location/name, description of waste, and decision on waste acceptance. The inspection information will be documented on the Inspection / Screening form in the Appendix.

Todco currently employs a multi-stage waste screening program for its wood waste recycling process. The intent of the screening program is to prevent acceptance of excluded wastes by detecting excluded wastes before they arrive at the waste unloading area. Since Todco accepts wood waste from three sources, screening procedures vary depending on the source of the waste as follows:

- **Best Disposal Roll-off boxes** - Best Disposal drivers are trained to inspect each roll-off container prior to pickup to identify wastes not suitable for wood recycling. Roll-off containers suspected of containing excluded wastes are transported directly to the Davidson County landfill or other permitted facility for disposal. Roll-off containers appearing to contain acceptable wood wastes are transported to Todco. The Todco Operations Manager inspects each roll-off container prior to unloading. Based on visual inspection, the Operations Manager decides whether a roll-off container can be emptied on-site or diverted to an off-site facility. A final visual inspection is made by Todco personnel for excluded wastes after the roll-off is emptied. Identified excluded or prohibited wastes (such as treated timbers) are separated and loaded into a roll-off container for

disposal at an off-site permitted facility.

- **Commercial wood waste sources** - Todco accepts wood waste from a limited number of wood waste sources such as furniture and wood flooring manufacturers. Typically, these wastes are source separated at the manufacturing facility. Todco personnel visually inspect each incoming waste load prior to acceptance and will not accept loads suspected of containing excluded wastes. Todco personnel visually inspect waste loads as they are unloaded and either separate excluded wastes or reload the entire waste load for disposal at an off-site permitted facility.

- **Private wood waste sources** - Todco accepts wood waste from individuals on a case by case basis. Todco personnel inspect each waste load prior to unloading and divert those loads suspected of containing excluded wastes to an off-site permitted facility. Todco personnel visually inspect waste loads as they are unloaded and either separate excluded wastes or reload the entire waste load for disposal at an off-site permitted facility.

Todco will begin accepting waste from construction and select demolition projects for sorting and recycling. The intent of the waste screening program is to detect prohibited wastes before they arrive at the Todco facility to ensure those wastes are disposed of at an approved facility. Todco anticipates receiving construction and demolition waste from two sources:

- **Best Disposal Roll-off Boxes** - Todco/Best Disposal will maintain records of roll-off containers placed at construction and demolition projects. Drivers will inspect roll-off containers at construction and demolition sites prior to pickup to visually identify waste loads containing excluded waste types. Drivers will contact the Todco Operations Manager for instructions when roll-offs are suspected of containing excluded waste types. The Operations Manager will decide whether to transport the roll-off to an off-site permitted facility or to Todco for further inspection. Once on-site, Todco personnel will identify roll-off containers intended for sorting and processing and will visually inspect the roll-off containers before unloading. Waste loads found to contain unacceptable materials will be diverted to an approved off-site disposal facility.

- **Other Commercial Haulers** - Todco plans to accept construction and demolition debris from other waste haulers on a case by case basis. Normal procedures will require a pre-authorization from Todco. The pre-authorization process will allow Todco to gather information on the source

of the waste and anticipated tonnage and allow Todco to dictate terms and conditions of receiving the waste. Each incoming waste load will be inspected by Todco personnel. Waste loads found to contain unacceptable materials will be diverted to an approved off-site permitted disposal facility. Todco personnel will visually inspect waste loads as they are unloaded at the sorting pad and either separate excluded wastes or reload the entire waste load for disposal at an off-site permitted facility.

Regardless of the source of the waste, any unloaded waste will be visually inspected for excluded wastes by the operations manager. The operations manager may direct Todco personnel to begin sorting the waste and separating excluded wastes into a separate roll-off container or the entire load may be reloaded into a roll-off container for transportation to an off-site permitted facility for disposal. Any excluded waste types that are found will be separated into a roll-off container and transported to an off-site permitted facility at the end of each operating day and/or when the roll off is full.

Todco personnel will monitor the total amount of waste accepted throughout the day to ensure that the sorting and processing operation runs smoothly and that excessive amounts of construction and demolition waste do not accumulate. All waste will be placed on the concrete pad, in bins, and/or under a canopy or tarp. After an amount of waste sufficient to begin processing operations is present, the waste will be sorted. If materials are left on the tipping floor at the end of the operating day, these materials will be under the canopy and tarped.

2.3 Facility Operations

2.3.1 Service Area and Operating Capacity

Todco anticipates receiving wastes from sites within a 50-mile radius of the subject facility. The facility is expected to process approximately 5,000 to 26,000 tons of construction and demolition waste per year. This amount equates to a maximum daily volume of construction and demolition waste of approximately 100 tons per day (based on 260 work days per year) and 2,167 tons per month (based on 21.67 working days per month).

2.3.2 Disposal Facilities

Roll-off containers suspected of containing prohibited wastes are transported directly to the Davidson

County Landfill (Permit #29-06) along Roy Lopp Road adjacent north of the subject site. Occasionally wastes may be transported to other permitted facilities for disposal. Municipal waste generated from the subject facility will also be disposed of at the Davidson County Landfill.

Todco has ample space for storage of wood wastes in the event of a processing equipment breakdown, inclement weather, or other unforeseen circumstance. Todco can cease to accept construction and demolition waste and divert wastes to an off-site permitted facility as needed. In the event an excluded waste material is identified at the Todco site, Todco personnel will remove the waste as soon as practicable. Excluded wastes will be placed in a roll-off container and transported to an off-site permitted facility as soon as practicable.

2.3.3 Mobile Equipment

Equipment normally used at the site includes the following:

- 938G rubber tire loader, 963 track loader, and 236 skid loader
- JD 300 tractor
- 4060 West Salem horizontal hog grinder
- Morbark 1200 tub grinder, Morbark 1300 tub grinder
- CEC 16x5 Roadrunner screen
- G27 Tromel Screen
- IT 28 wheel loader
- Mack road tractors (4) for delivering material
- Four open-top chip trailers (for storage prior to transport)
- Dump Trailer and Flat Bed Trailer
- Coloring machine and conveyor system
- 1100-gallon fire truck for dust control and fire suppression
- Truck weight scale
- 320 DL Trackhoe
- 938H Wheel Loader
- Picking Line Station

Periodic maintenance will be performed on the equipment as needed. Maintenance will be performed at the location of the piece of equipment or at/near the maintenance building in the center of the facility.

2.4 Recycling Operations

Wood wastes received at the facility are temporarily stored in either the yard waste or wood waste areas located on a concrete pad in the eastern portion of the facility (Figure 3). The pad is approximately 200

feet wide and 240 feet long. Todco recycles all of the wood and yard waste. The process time for the waste recycling varies from less than one day to a few months. Todco processes most waste received within one week. Todco typically processes about six tons of waste per day. In addition, Todco purchases pine bark, hardwood mulch, and cedar logs from other facilities and processes the material for resale.

Processing includes transferring the materials to the grinder using one of several loaders, reducing size and volume in the grinder, and then transferring the shredded material to specific storage areas on the property for various end products. Some yard waste is transferred to a hopper using a conveyor belt and colorized for mulch. The colorized mulch is stored on a concrete pad in a storage bin. Processed yard waste is kept separate from wood waste. Most of the processed wood waste is sold as boiler fuel. All engineered wood products (glued) and wood that has been treated, painted, or varnished are ground and sold for boiler fuel.

Some of the processed wastes are temporarily stored in piles or windrows. The windrows are approximately one to 15 feet high and vary in width and length. The average width of the windrows is approximately three feet. Gravel or dirt access roads are maintained between the windrows. The windrows are periodically moved to different locations on the site prior to sale. This is done to segregate the materials by type and age and to keep pile temperatures below levels conducive to composting or spontaneous combustion.

Non-recyclable materials which are received at the facility, such as creosote timbers, are separated and placed in a roll-off located on the concrete pad near the grinding area. Best Disposal transports the roll-off to the Davidson County Landfill or other permitted facilities about twice per month and/or when the roll-off is full. Non-recyclable materials include trash bags and domestic trash which are removed from the waste stream during the grinding process. Metals (nails, hinges, etc.) are transported off-site for recycling. In addition, the facility occasionally receives large diameter logs. These logs are ground along with other large wood debris in a tub grinder before final processing.

Management of proposed new construction and demolition wastes will follow similar on-site processing procedures. Waste materials will be dumped onto the concrete sorting pad and sorted by hand or equipment as needed. Sorted recyclable products such as metal, cardboard, paper, glass, plastic, concrete and concrete block, and electrical wiring will be placed in individual storage bins. Periodically, the sorted materials will be placed in roll-off containers for transportation to local recycling facilities. Sorted wood

waste products will be diverted into the existing wood recycling operation at this site. All other waste materials not suitable for recycling will be placed in a roll-off container for transportation to the Davidson County Landfill or other permitted facilities when the roll-off box is full. All sorted and unsorted waste will be contained on the concrete pad beneath the roof/canopy. If materials are left on the tipping floor at the end of the operating day, these materials will be under the canopy and tarped. Waste will be stored on-site in leak proof containers with water tight covers for a maximum of five working days. Waste will be stored under the canopy on the concrete pad until an amount of waste sufficient to operate a full day is present. Storage of the waste will not cause any nuisance, such as odor or attraction of vectors.

Figure 3A illustrates the construction and demolition waste sorting and processing area of the site. Concrete interlocking blocks are used to completely separate the waste sorting and recycling area from other wood recycling operations to prevent intermingling of different waste types. This area consists of the following:

- Concrete pad across entire area. Pad is seven to eight inches thick, 200 feet long and 60 to 80 feet wide.
- Concrete wall on the north and east sides of the area consisting of barrier blocks (two feet tall, two feet wide, and six feet long).
- Cover roof/canopy structure over the waste sorting area. The C&D waste will be unloaded onto a concrete pad that contains a fabric cover/canopy. The top of the canopy will be approximately 34 feet above the ground surface. Manufacturer's literature on the structure is presented in the Appendix. Waste material that cannot be recycled will be placed into a roll-off container for transportation to an approved C&D landfill. The rolloff will be covered.
- Picking station – The recyclable materials removed from the waste will be placed onto an elevated covered picking conveyor, sorted, and placed into bins and/or rolloff containers that are either watertight, covered with a lid, and/or under roof. A copy of equipment literature on the picking station is presented in the Appendix. The picking station is located on the concrete pad. The bins will be created using interlocking precast concrete blocks similar to those used to store mulch in the mulch processing and storage area.

Little if any water should come into contact with the waste materials. If for some reason, significant water comes into contact with C&D waste at the facility, then this water will be captured and transported off-site or treated on-site prior to release.

3.0 ENVIRONMENTAL MANAGEMENT

3.1 Surface Water Control

The site is managed in such a manner as to minimize standing water. Gravel or dirt roadways are maintained between each waste pile or windrow to allow surface water to flow between the piles. Stormwater is channeled into several ditches on the site and diverted to rock and spillway outlets. Several stormwater culverts are present on the site. The culverts collect surface water from the drainage ditches and divert the water under the access roads to prevent erosion of the roads.

Erosion control is achieved primarily through the use of collection ditches and permanent sediment basins/traps at the locations shown on Figure 3. In working areas of the site where vegetative groundcover is not present mulch is used to cover exposed soils to limit erosion. Roadways are maintained in an all weather condition to ensure access.

Permanent drainage features such as roadside swales, culverts, and sediment traps are maintained regularly by on-site personnel to ensure positive drainage. Excessive erosion is controlled through the use of groundcover (vegetation and mulch), silt fences, and rip rap/stone structures to trap sediment before it leaves the site. Sediment traps are in place to capture concentrated stormwater and settle out suspended sediment before discharging stormwater off-site. Sediment traps are cleaned periodically to provide sediment storage capacity.

The site is located on top of a topographic high or ridge, and stormwater management is such that spills or releases of contaminants should be contained before reaching adjacent surface waters. The majority of surface water flow across and off the site is sheet flow. Stormwater management practices include perimeter berms, sediment traps/settling basins, silt fences, and other physical barriers to direct releases into surface water.

Todco operates under the NCDENR Division of Water Quality General Permit No. NCG21000 for stormwater discharges under the National Pollutant Discharge Elimination System (NPDES). Blue Ridge prepared a Stormwater Pollution Prevention Plan (SWPPP) for the subject facility which describes site operations and controls to minimize contaminants from migrating off-site by stormwater flow. The plan is revised and updated as necessary.

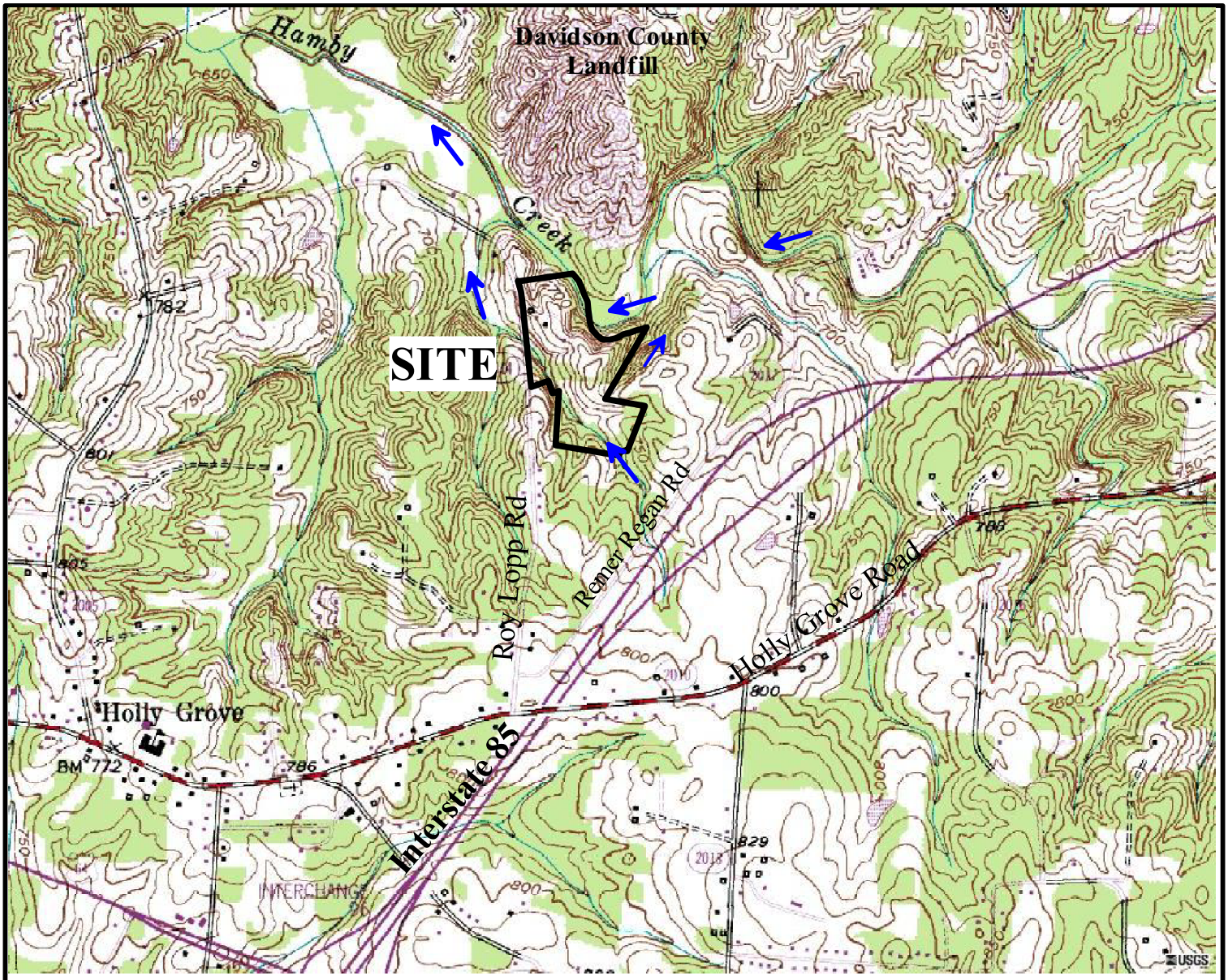
3.2 Vector Control

Insect and rodent control is achieved primarily by maintaining the site to prevent standing water. Mulch windrows are turned on a set schedule and waste piles do not go unprocessed for longer than one week to minimize animal or insect population. Excessive vector populations can be controlled through the use of insecticides, rodentcides, or repellants.

3.3 Dust Control

Because many of the wood products entering the facility are dry when received, dust can result from material processing. The hog grinder is equipped with a sprayer at its entrance to wet the materials on the conveyor immediately prior to grinding to reduce dust release. Dust from vehicle movement on dry dirt surfaces and from handling dry processed materials is controlled with a water truck, by way of either a spray bar or a hose nozzle. Dust controls are implemented as needed to prevent other than incidental releases of dust beyond property boundaries.

FIGURES



Legend

Surface Water Flow Direction

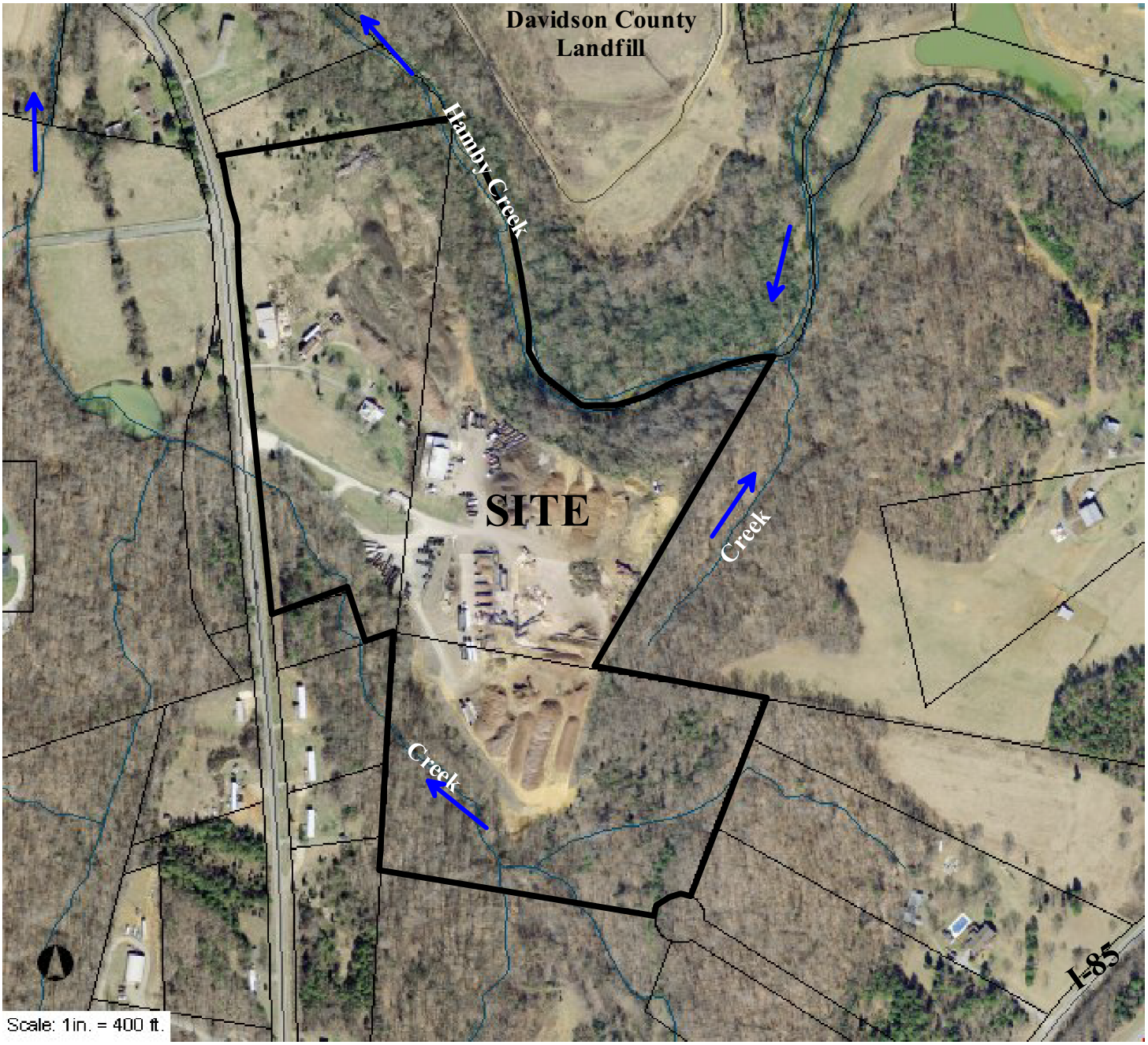
REF.: USGS Lexington East, NC Quadrangle Dated 1950
photorevised 1994, from MSR Maps

BLUE RIDGE
GEOLOGICAL SERVICES, INC.

Site Vicinity Map

Todco, Inc.
1123 Roy Lopp Road
Lexington, North Carolina

Nov 2012	Figure 1



REF.: Davidson County GIS - 2009 Aerial Photograph

BLUE RIDGE
GEOLOGICAL SERVICES, INC.

Tax Map

Todco, Inc.
1123 Roy Lopp Road
Lexington, North Carolina

Oct 2011	Figure 2

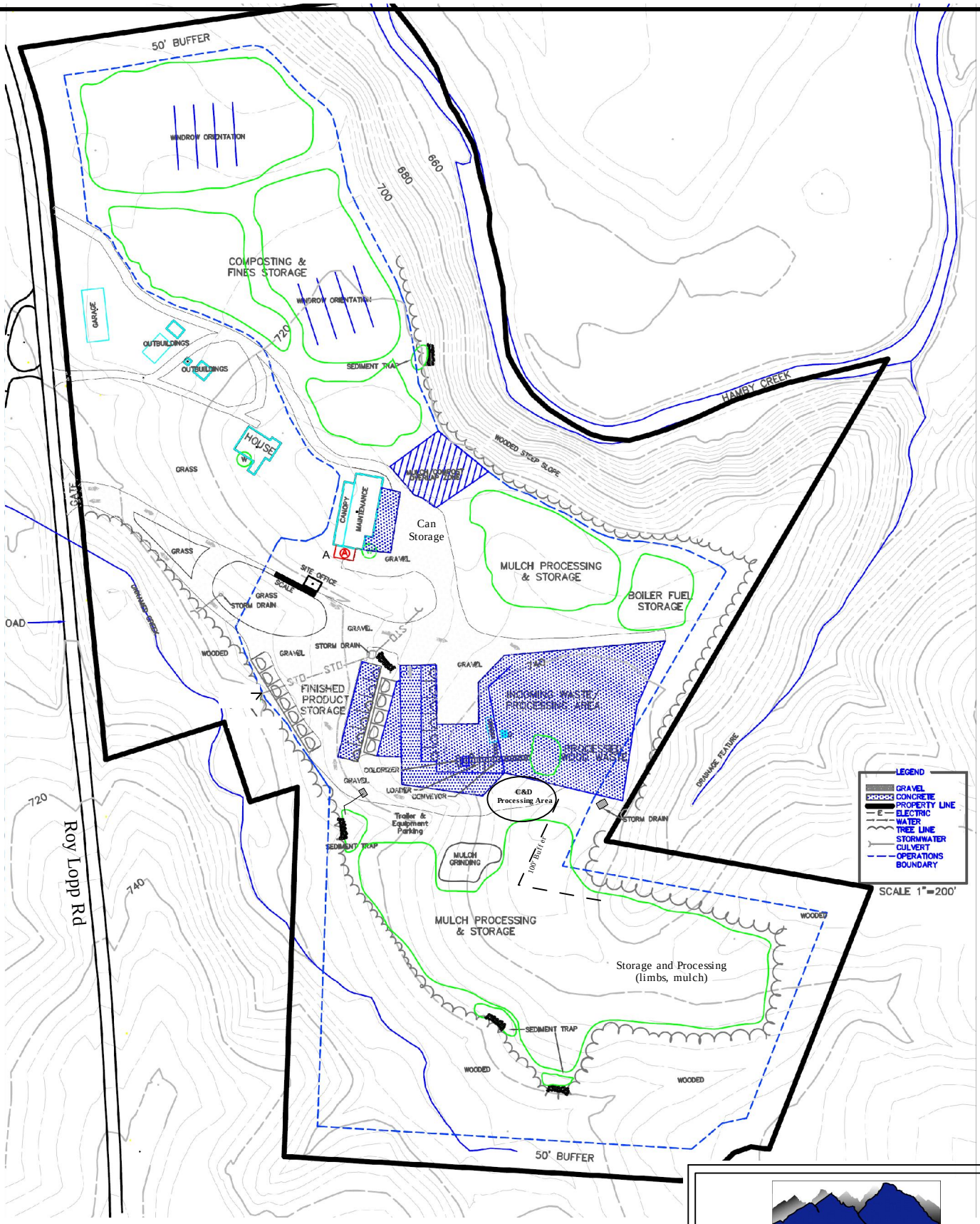
REF.: Todco photograph

BLUE RIDGE
GEOLOGICAL SERVICES, INC.

2011 Aerial Photograph

Todco, Inc.
1123 Roy Lopp Road
Lexington, North Carolina

Oct 2011	Figure 2A



Legend

A - Aboveground Storage Tank (AST) - three diesel ASTs

W - Water Supply Well

Approx Scale - 1 inch = 200 feet

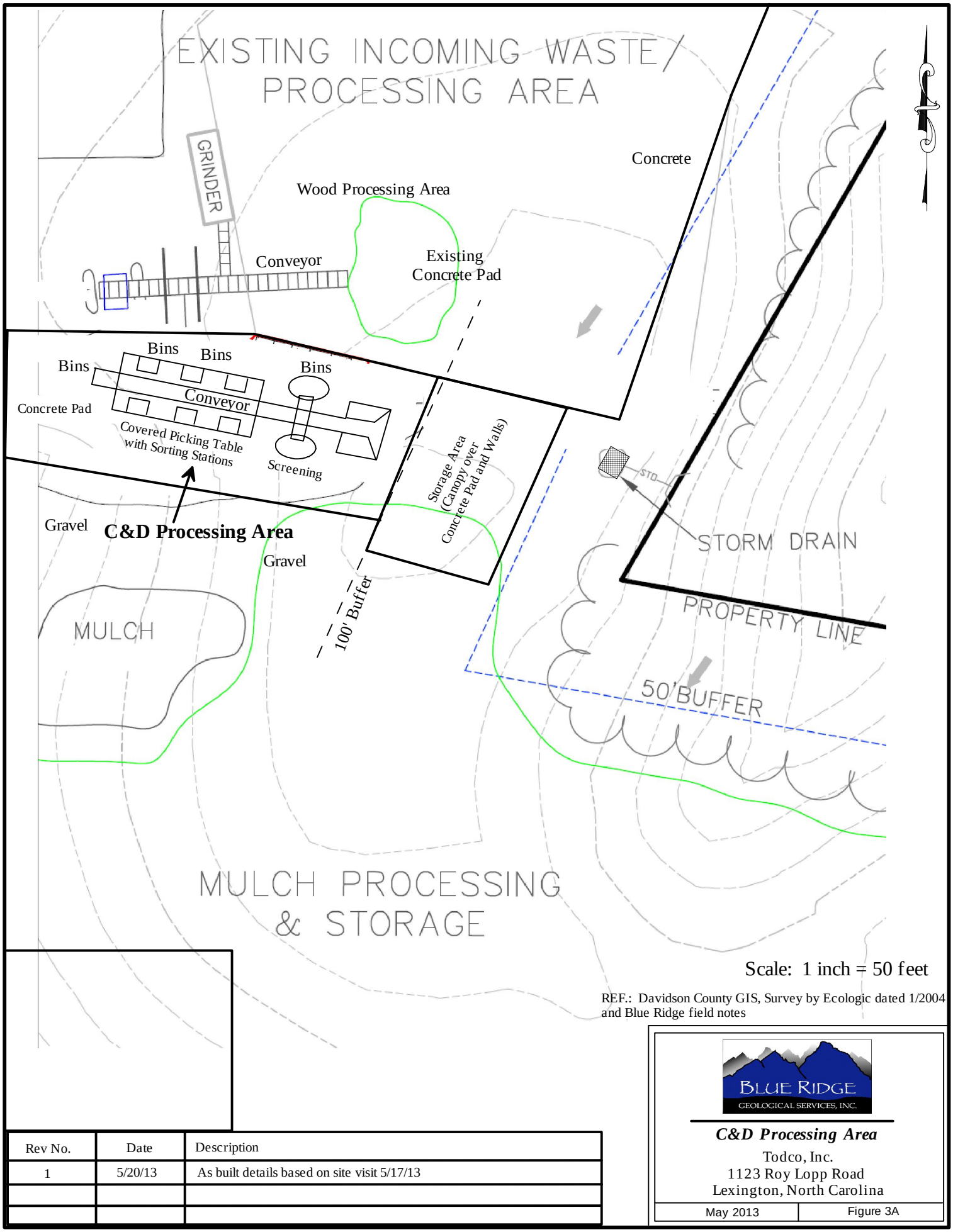
REF.: Davidson County GIS, Survey by EcoLogic dated 1/04

BLUE RIDGE GEOLOGICAL SERVICES, INC.

Site Plan

Todco, Inc.
1123 Roy Lopp Road
Lexington, North Carolina

May 2013	Figure 3



Scale: 1 inch = 50 feet

REF.: Davidson County GIS, Survey by Ecologic dated 1/2004 and Blue Ridge field notes

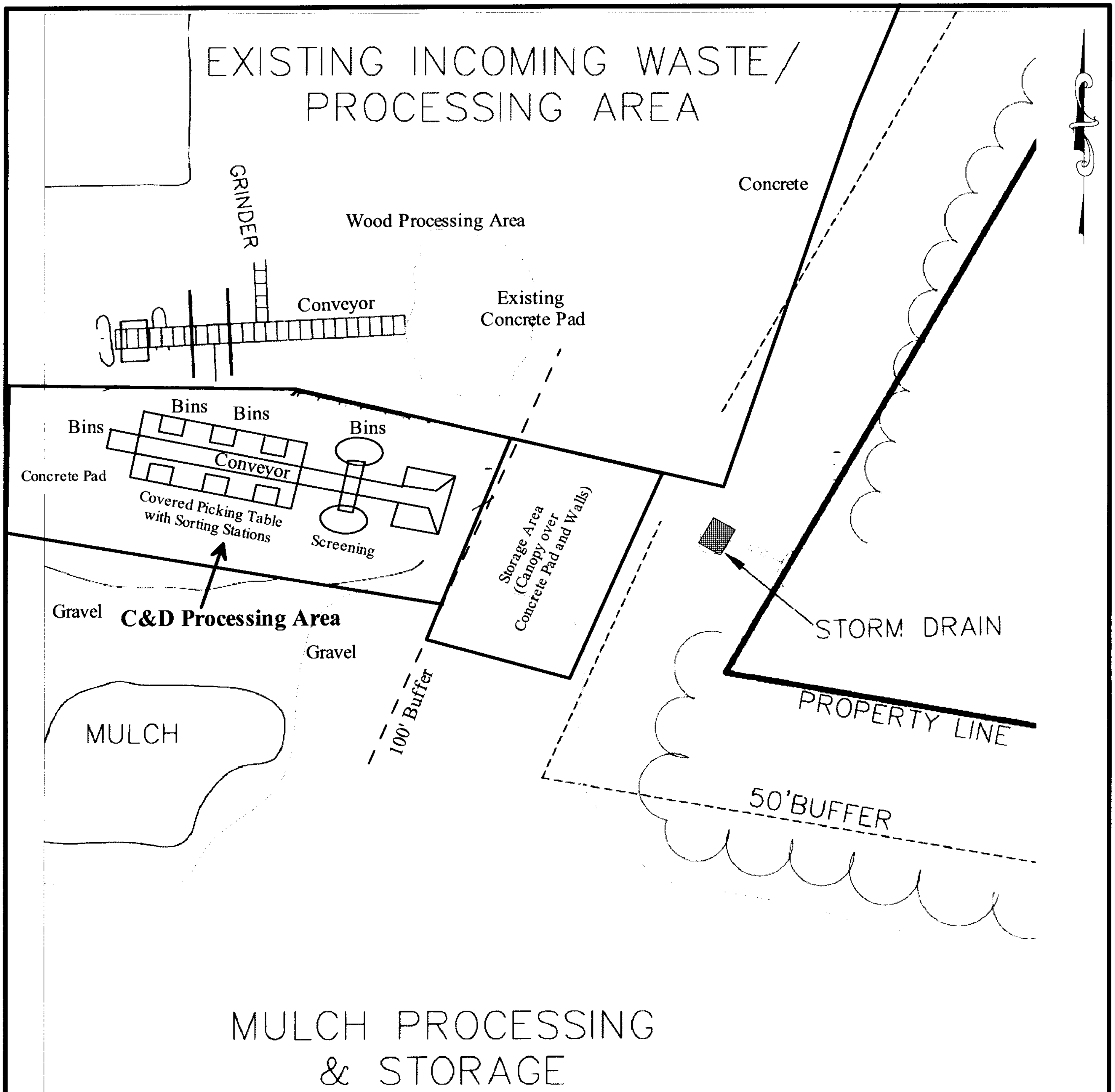
Rev No.	Date	Description
1	5/20/13	As built details based on site visit 5/17/13

BLUE RIDGE
GEOLOGICAL SERVICES, INC.

C&D Processing Area

Todco, Inc.
1123 Roy Lopp Road
Lexington, North Carolina

May 2013 | Figure 3A



Scale: 1 inch = 50 feet

REF.: Davidson County GIS, Survey by Ecologic dated 1/2004 and Blue Ridge field notes

SEAL
C 21801
P. GREG GARRETT
ENGINEER
5/20/13

Rev No.	Date	Description
1	5/20/13	As built details based on site visit 5/17/13

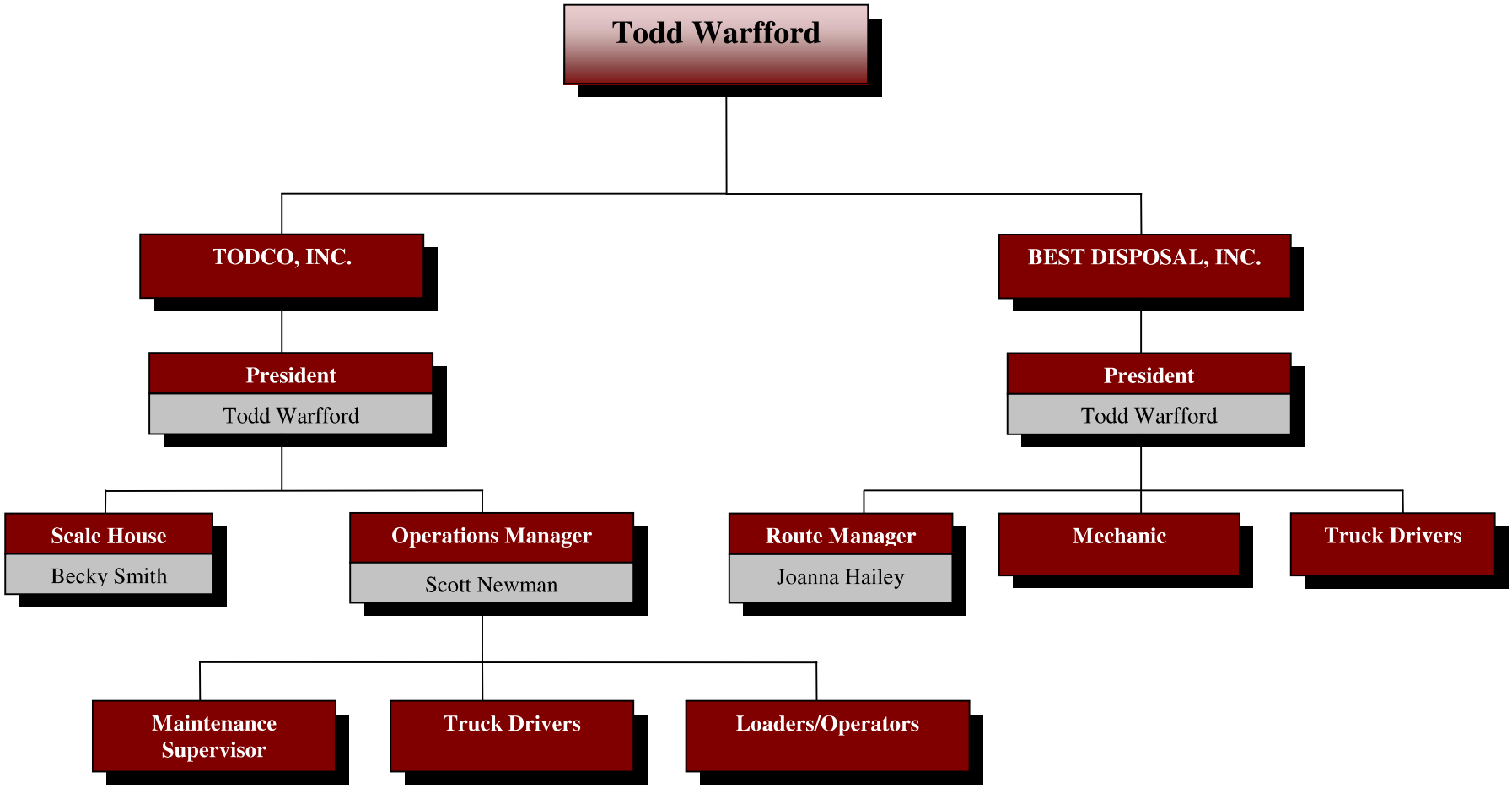
C&D Processing Area

Todco, Inc.
1123 Roy Lopp Road
Lexington, North Carolina

May 2013	Figure 3A

APPENDIX

ORGANIZATIONAL CHART



TREAT & PROCESS	State of North Carolina Department of Environment and Natural Resources Division of Waste Management	**TREATMENT & PROCESSING FACILITY** Facility Annual Report For the period of **July 1, 2010-June 30, 2011**

According to (G.S. 130A-309.09D(b)) completed forms must be returned by August 1, 2011 and a copy of this report must be sent to the County Manager of each county from which waste was received. If you have questions or require assistance in completing this report, contact your Regional Environmental Senior Specialist.

Facility Name: _____ Permit: _____ ID: _____

Facility Website (URL): _____

Physical Address	Mailing Address
Street 1:	Street 1:
Street 2:	Street 2:
City: County:	City:
State: North Carolina Zip:	State: North Carolina Zip:

Primary Facility Contact Person	Billing Contact Person
Name:	Name:
Phone: Fax:	Phone: Fax:
Email:	Email:

1. Tipping Fee: $ _____ per Ton (Attach a schedule of tipping fees if appropriate.)

2. Did your facility stop receiving waste during this past Fiscal Year? ☐ Yes ☐ No

If so, please report the date this occurred: _____

3. Indicate types of waste processed at this facility. (Check all that apply)

- ☐ Medical Waste
- ☐ Industrial Waste
- ☐ Construction and Demolition Waste
- ☐ Asphalt/Shingles
- ☐ Household Hazardous Waste
- ☐ Landclearing and inert debris (LCID)
- ☐ Yard Waste
- ☐ Concrete/rubble
- ☐ Gypsum/drywall
- ☐ Other (describe) _____

4. Indicate types of processes occurring at this facility. (Check all that apply)

- ☐ Grinding, composting or mulching
- ☐ Medical Waste treatment
- ☐ Incineration
- ☐ Collection (indicate materials collected, check all that apply)
  - ☐ Paper ☐ Wood ☐ White Goods ☐ Scrap Tires
  - ☐ Cardboard ☐ Glass ☐ Aluminum Cans ☐ Steel Cans
  - ☐ PETE (#1) Plastic ☐ HDPE (#2) Plastic ☐ Computer Equipment ☐ Televisions
  - ☐ Fluorescent lightbulbs ☐ Used oil/oil filters ☐ Other Metal ☐ Other Plastic
- ☐ Other activities (specify) _____

5. Indicate the type and quantity of material from recycling or recovery operations stockpiled on-site as of June 30, 2011 (e.g. Wood-3 tons, Metal-5 tons, Cardboard-2 tons, etc.).

6. Total waste received at this facility during the period of July 1, 2010 through June 30, 2011. Indicate **tonnage** received by COUNTY of waste origin. If waste was received from a transfer station,treatment and processing, or mixed waste processing facility indicate the COUNTY LOCATION OF THE FACILITY. DO NOT include waste diverted for recycling, reuse, mulching, or composting. Please list ALL counties from which you received waste. Please indicate COUNTY and STATE, if received from another state.

Received from	Jul	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	June	Total

Grand Total

7. Indicate the facility(s) that received your facility's non-recycled waste material:

NAME, PERMIT #, and LOCATION (city, state) of FACILITY	Facility Type	Tons
	TOTAL	

REMINDER: According to (G.S. 130A-309.09D(b)), this report must be sent to the Regional Environmental Senior Specialist for your area and a copy of this report must be sent to the County Manager of each county from which waste was received.

Please return your completed report to:

CERTIFICATION: I certify that the information provided is an accurate representation of the activity at this facility.

Signature: _____ Date: _____

Name: _____ Title: _____

Phone Number: _____ Email: _____

BANK of NORTH CAROLINA

October 17, 2012

North Carolina Department of Environment, Health, and Natural Resources
Solid Waste Management Division
Solid Waste Section
P.O. Box 27687
Raleigh, North Carolina 27611-7687

Subject: **Irrevocable Standby Letter of Credit**
Todco, Inc. Facility
1123 Roy Lopp Road
Lexington, Davidson County, North Carolina

Dear Sir or Madam:

We hereby establish our Irrevocable Standby Letter of Credit No. 100237703 in your favor, at the request and for the account of **Todco, Inc.** up to the aggregate amount of [twenty five thousand] U.S. dollars $25,000, available upon presentation of

(1) your sight draft, bearing reference to this letter of credit No.100237703, and
(2) your signed statement reading as follows: "I certify that the amount of the draft is payable pursuant to requirements of 15A NCAC 13B .1628 as amended."

This letter of credit is effective as of [October 17, 2012] and shall expire on [October 17, 2013], but such expiration date shall be automatically extended for a period of [at least 1 year] on [October 17, 2012] and on each successive expiration date, unless, at least 120 days before the current expiration date, we notify both you and **Todco, Inc**. by certified mail that we have decided not to extend this letter of credit beyond the current expiration date. In the event you are so notified, any unused portion of the credit shall be available upon presentation of your sight draft for 120 days after the date of receipt by both you and **Todco, Inc**., as shown on the signed return receipts.

Whenever this letter of credit is drawn on, under and in compliance with the terms of this credit, we shall duly honor such draft upon presentation to us, and we shall deposit the amount of the draft directly into the standby trust fund of **Todco, Inc**., in accordance with your instructions.

We certify that the wording of this letter of credit is identical to the wording specified in Paragraph (e)(2)(D) of 15A NCAC 13B .1628 as were constituted on the date shown immediately below.

Sincerely,

Mr. Larry Link, Vice President
Bank of North Carolina

October 17, 2012

This credit is subject to the "Uniform Customs and Practices for Documentary Credits (2007 revision), International Chamber of Commerce publication No 600".

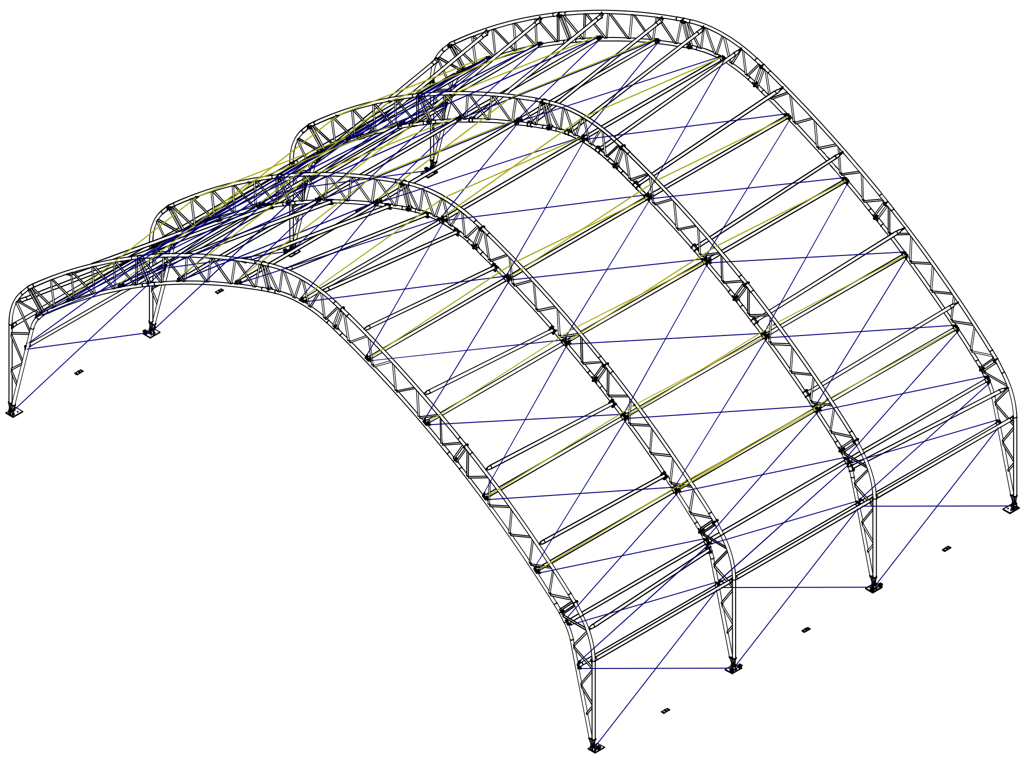
ADDITIONAL INFORMATION

THESE PRINTS IDENTIFY AND SHOW THE MAIN COMPONENTS AND CONNECTIONS FOR THIS BUILDING. LENGTH, WIDTH, AND OTHER IMPORTANT DIMENSIONS ARE ALSO PRESENT.

TO BEST UNDERSTAND HOW TO CONSTRUCT THIS BUILDING, THE INFORMATION CONTAINED WITHIN THESE SHEETS SHALL BE USED WITH THE INSTRUCTION MANUAL SHIPPED WITH THE BUILDING.

THE INSTRUCTIONS INCLUDE DETAILS NEEDED DURING CONSTRUCTION.

MOST QUESTIONS THAT ARISE BEFORE AND DURING CONSTRUCTION ARE ANSWERED WITHIN THE INSTRUCTIONS AND THESE SHEETS.



T083HKM010060MN

83x60 HKM TRS 12.5oz WHT/GRN 2PK+6"

BUILDING CONTENT GUIDE:

CUSTOMER DESIGN APPROVAL

PLEASE SIGN AND CHECK THE APPROPRIATE BOX BELOW THE SIGNATURE AFTER REVIEWING THE DOCUMENTS.

MY SIGNATURE BELOW ACKNOWLEDGES THAT I HAVE READ AND REVIEWED ALL THE SHEETS LISTED IN THE CONTENT GUIDE AND AGREE TO THE SPECIFICATIONS SHOWN UNLESS OTHERWISE NOTED.

UPON ACCEPTANCE OF THE DRAWINGS, ANY DEVIATIONS FROM THE SIGNED DRAWINGS AND SPECIFICATIONS OUTLINED IN THE EXECUTED DRAWINGS ARE SUBJECT TO ADDITIONAL CHARGES AND MAY RESULT IN DELAY OF INSTALLATION OR DELIVERY OF YOUR STRUCTURE. A CHANGE ORDER WILL BE ISSUED TO YOU WITH THE OUTLINED ADDITIONAL COST ASSOCIATED WITH THESE CHANGES AND A PROPOSED NEW DELIVERY SCHEDULE.

NO CHANGES WILL BE ACCEPTED UNLESS WE HAVE A CHANGE ORDER SIGNED BY AN AUTHORIZED REPRESENTATIVE.

FIRE-RATED OR NON FIRE-RATED NON FIRE-RATED
TERMINATION OF FABRIC GROUND FLAP W/ PIPE POCKET
FABRIC COLOR WHITE W/ GREEN TRIM
WEIGHT OF MATERIAL 12.5 **OZ.**

CUSTOMER SIGNATURE *DATE*

☐ **APPROVE** ☐ **APPROVE WITH CHANGES**

DEVELOPED BY
ClearSpan
A DIVISION OF ENGINEERING SERVICES & PRODUCTS CO.
1440 18TH AVENUE SW
DYERSVILLE, IA 52040
P: 563.875.6113
F: 563.875.2317
WWW.ESAPCO.COM

ORDER #:

CUSTOMER #:

STRUCTURE SKU #: T083HKM010060MN
STRUCTURE SIZE: 83' X 60'
STRUCTURE DESCRIPTION: 83x60 HKM TRS 12.5oz WHT/GRN 2PK+6"

DRAWING DETAILS
DRAWN BY:	CREATION DATE:
MMP	3/19/2012

REVISIONS:
NO.	BY:	REVISION DATE:
1	TS	9/21/2012
2		
3		
4		

NOT TO SCALE SHEET SIZE: 11X17

SHEET: A1-1.0

GENERAL NOTES

GENERAL NOTES:

FOUNDATION:

1. FOUNDATION AND ANCHORING SHALL BE ENGINEERED AND APPROVED BY A LOCALLY LICENSED STRUCTURAL ENGINEER.

GENERAL ABBREVIATIONS:

TOS TOP OF STEEL / **TSL** TOP OF SLAB / **GALV.** GALVANIZED / **FND** FOUNDATION / **EL** ELEVATION / **RND.** ROUND / **GA** GAUGE / **DIA.** DIAMETER / **TYP.** TYPICAL / **LBS.** POUNDS / **CL** CENTERLINE

SITE ADAPTATION/ENGINEERING VERIFICATION:

1. PRIOR TO COMMENCING FABRICATION FOR A SPECIFIC SITE, VERIFY IF ANY MODIFICATIONS TO THE STRUCTURE AND/OR FOUNDATION CONNECTIONS ARE REQUIRED BY THE SITE ADAPTATION ENGINEER.

2. THIS IS A PROTOTYPICAL DESIGN AND DOCUMENT SET. THE DESIGN AND DEPICTED FABRICATION, ERECTION, AND FOUNDATION DRAWINGS ARE ONLY VALID FOR THE EXACT DESIGN PARAMETERS AND COMBINATIONS OF PARAMETERS DOCUMENTED. THE DESIGN MUST BE SITE ADAPTED TO SPECIFIC SITES. ANY USE OF THIS DESIGN AND DOCUMENT FOR A SPECIFIC SITE REQUIRES:

   A. DESIGN PARAMETER VERIFICATION BY A REGISTERED PROFESSIONAL ENGINEER, EXPERIENCED IN STRUCTURAL ENGINEERING. VERIFY THAT LOADING CONDITIONS AND THE REQUIREMENTS OF THE SITE ARE EQUAL TO OR LESS THAN THE DOCUMENTED DESIGN PARAMETERS AND/OR COMBINATION OF THE DOCUMENTED DESIGN PARAMETERS.

   B. VERIFICATION OF SPECIFIC SITE SOIL CONDITIONS. FIELD VERIFY THAT THE EXISTING SITE SOIL CONDITIONS ARE EQUAL TO OR GREATER THAN THE DOCUMENTED DESIGN PARAMETERS AND/OR COMBINATIONS OF DOCUMENTED DESIGN PARAMETERS.

   C. ANY SITE SPECIFIC CONDITIONS FAILING "A" OR "B" WILL REQUIRE RE-ANALYSIS OF THE STRUCTURE AND/OR FOUNDATION BY A CERTIFIED DESIGN PROFESSIONAL. FAILURE TO VERIFY THE VALIDITY OF THIS DESIGN FOR A SPECIFIC SITE, FOLLOWED BY ANY NECESSARY SITE ADAPTATION MODIFICATION CAN RESULT IN A DANGEROUS SITUATION.

STEEL:

1. ALL STRUCTURAL STEEL TUBING SHALL BE GALVANIZED, MIN. YIELD STRENGTH 50 KSI, AND SHALL MEET OR EXCEED THE REQUIREMENTS OF ASTM A500.

2. STEEL PLATES SHALL COMPLY WITH ASTM A572 GRADE 50 OR EQUAL (3/8" OR GREATER THICKNESS) OR ASTM A36 (LESS THAN 3/8" THICKNESS). STRUCTURAL STEEL IS TO BE SHOP PRIME-COATED WITH COLD GALVANIZING COMPOUND. APPLY SHOP PRIME-COAT TO OBTAIN A UNIFORM DRY FILM THICKNESS OF NOT LESS THAN 2-MILS.

3. ALL BOLTED CONNECTIONS SHALL USE A325 BOLTS WITH COMPATIBLE WASHERS AND NUTS OF DIAMETERS INDICATED ON PLANS. BOLTS NEED ONLY BE TIGHTENED TO THE SNUG-TIGHT CONDITION. THE SNUG-TIGHT CONDITION IS DEFINED AS THE TIGHTNESS ATTAINED BY A FEW IMPACTS OF AN IMPACT WRENCH, OR THE FULL EFFORT OF A MAN USING AN ORDINARY SPUD WRENCH.

4. ALL STRUCTURAL STEEL IS TO BE FABRICATED IN ACCORDANCE WITH THE LATEST EDITION OF AISC "SPECIFICATION FOR THE DESIGN, FABRICATION AND ERECTION OF STRUCTURAL STEEL FOR BUILDINGS."

CABLES AND HARDWARE:

1. ALL CABLE SHALL BE GALVANIZED STEEL, MULTIPURPOSE, 7X19 (UP TO 3/8" DIA.) OR 6X26 (1/2" DIA.) CLASS STRAND CORE COMMERCIAL GRADE, OF DIAMETER INDICATED.

2. CABLE SLEEVES SHALL BE INSTALLED PER MANUFACTURER'S RECOMMENDATIONS.

3. USE THIMBLES WITH CABLE SLEEVES IN ALL LOOP-END APPLICATIONS.

4. TENSION CABLES AT TURNBUCKLE TO TAUT CONDITION (STRAIGHT AND NOT SLACK OR LOOSE).

5. TIGHTEN CABLES SEQUENTIALLY TO AVOID TWISTING OR DEFORMING STRUCTURAL ELEMENTS DURING ERECTION. RECHECK PREVIOUSLY TIGHTENED CABLES UNTIL ALL CABLES ACHIEVE TAUT CONDITION.

WELDING:

1. REFER TO "WELDING GUIDELINES" PUBLISHED BY ALLIED TUBE AND CONDUIT - HARVEY, ILLINOIS, FOR RECOMMENDED PROCESSES AND PRACTICES FOR WELDING GALVANIZED STEEL TUBING.

   A. TO DEVELOP THE FULL STRENGTH AT PIPE JOINT, THE ALL AROUND FILLET WELDS SHALL BE SIZED AS FOLLOWS:

   THICKNESS OF THE TUBE - MINIMUM FILLET WELD SIZE

GAUGE 14	1/8"
GAUGE 13 & 12	5/32"
GAUGE 11 & 10	3/16"
GAUGE 9 & 8	7/32"
GAUGE 7	1/4"

   (PLEASE NOTE: WHEN TUBES OF TWO DIFFERENT WALL THICKNESSES ARE JOINED, THE MINIMUM FILLET WELD SIZE SHALL BE BASED ON THE THINNER OF THE TWO MEMBERS).

2. WELDS SHALL SHOW UNIFORM SECTION, SMOOTHNESS OF WELD METAL, FREEDOM FROM POROSITY AND CLINKERS, AND ADEQUATE STRENGTH AND DURABILITY.

3. ALL WELDS NOT OTHERWISE IDENTIFIED SHALL BE CONTINUOUS.

4. ALL SHOP WELDING IS TO BE DONE BY CERTIFIED OPERATORS (TEST POSITION 4F AND 5F WITH PIPE IS MINIMUM REQUIRED CERTIFICATION).

5. ALL WELDING SHALL BE IN ACCORDANCE WITH THE LATEST EDITION OF AWS D1.1 AND D1.3.

PAINTING AND TOUCH UP:

1. AFTER SHOP FABRICATION, TOUCH-UP ALL WELDS, ABRADED AREAS AND SCRATCHES WITH COLD GALVANIZING COMPOUND CONSISTENT WITH GALVANIZED TUBE MANUFACTURER'S RECOMMENDATIONS FOR COLOR AND COMPOSITION. PRIOR TO TOUCH-UP, CLEAN WELDED AND ABRADED AREAS WITH A WIRE BRUSH TO REMOVE SLAG AND LOOSE PARTICLES. SURFACES MUST BE CLEAN AND OIL FREE.

2. AFTER FIELD INSTALLATION, TOUCH-UP ALL ABRADED AREAS, SCRATCHES, FIELD WELDS, BOLTED CONNECTIONS AND ATTACHMENTS WITH COLD GALVANIZING COMPOUND OF THE SAME COMPOSITION AND COLOR USED FOR SHOP COATING.

ERECTION AND FIELD QUALITY CONTROL:

1. THE ERECTOR IS RESPONSIBLE FOR DESIGNING AND FURNISHING ALL TEMPORARY BRACING, SHORING, AND/OR SUPPORT THAT MAY BE REQUIRED AS THE RESULT OF ERECTOR'S CONSTRUCTION METHODS AND/OR SEQUENCES. THE STRUCTURE IS DESIGNED TO FUNCTION AS A UNIT UPON COMPLETION. THE STRUCTURAL ENGINEER ASSUMES NO LIABILITY FOR THE STRUCTURE DURING ERECTION.

2. NO OPENING (OTHER THAN THOSE SHOWN ON THE DRAWINGS) SHALL BE MADE IN ANY STRUCTURAL MEMBER, AND NO MODIFICATION OR ALTERATION SHALL BE MADE TO ANY STRUCTURAL MEMBER OR CONNECTION WITHOUT THE WRITTEN APPROVAL OF THE DESIGN ENGINEER.

DEVELOPED BY

ClearSpan

A DIVISION OF ENGINEERING SERVICES & PRODUCTS CO.
1440 18TH AVENUE SW
DYERSVILLE, IA 52040
P: 563.875.6113
F: 563.875.2317
WWW.ESAPCO.COM

ORDER #:

CUSTOMER #:

N M60010 MKH38DT

38' X 60'

DRAWING DETAILS:

DRAWN BY:	CREATION DATE:
MMP	9/19/2012

REVISIONS:

NO.	BY:	REVISION DATE:
1	TS	9/21/2012
2		
3		
4		

NOT TO SCALE | SHEET SIZE: 11X17

SHEET: B1-1.0

PICKING TABLE SYSTEMS

CEC®

Construction Equipment Co.

CEC Also Builds Portable Picking Stations

PICKING STATIONS

CEC Builds Custom Designs and Portable Picking Stations

- **RECYCLABLE ITEMS**
  - Wood
  - Cardboard
  - Plastic
  - Glass Containers
  - Plastic Containers
  - Bottles - Glass
  - Metal Cans
  - Concrete
  - Brick
  - Asphalt
  - Carpet
  - Scrap Metals
  - Aluminum Products
  - Copper Products
  - Dry Wall

- CEC Builds Picking Stations With The Number of Work Stations Your Job Requires
- CEC Builds Picking Stations For C&D - Garbage - Curbside Recycle - And Anything You Need
- Picking Station Units Can Be Fed By A Screen-It®, Screen Plant or A Free Standing Feed Belt System With Independent Feeder. Belt Feeders Can Be Designed For Your Specific Products
- System Drive Can Be Variable Speed Hydraulics or Variable Speed Electric Frequency Drives
- CEC Builds Stationary or Portable. We Build What You Need For Your Applications

- **TABLE WIDTHS**
  - 36”, 48”, 60”
- **DRIVES**
  - Electric Variable
  - Speed Hydraulic
  - Frequency Drive
- **FEED SYSTEMS**
  - SCREEN-IT®
  - Incline Conveyor
  - OPEN FEEDER
  - Incline Conveyor
- **OPTIONAL ITEMS**
  - Magnetic Belt Separator
  - Magnetic Head Pulley
  - Eddy Current Separator
  - Sun-Rain Roof
  - Stairways
  - Ladders
  - Electric Power Boxes

PICKING TABLE SYSTEMS

CEC Also Builds Portable Picking Stations

A End view of big unit with stairs and roof

B Lower Left Picture
Two Man Picking Station With Work Platforms and Access Ladders. Magnetic Pulley On Feed Conveyor

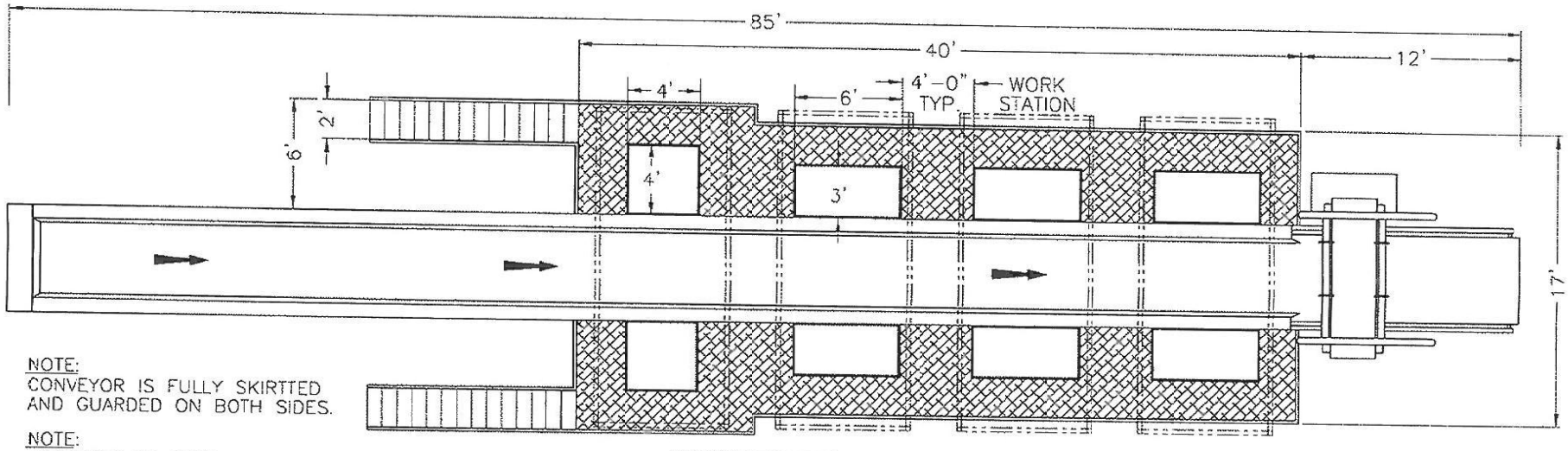
C Walkways, Work Station, Drop Chutes, Magnet

Construction Equipment Co.
18650 SW Pacific Highway
Tualatin, Oregon 97062
(503) 692-9000
Fax (503) 692-6220
www.ceccrushers.com

Form 945

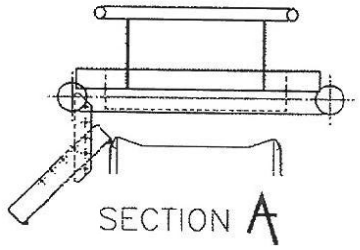
Made In USA

Area Dealer



NOTE:
CONVEYOR IS FULLY SKIRTTED AND GUARDED ON BOTH SIDES.

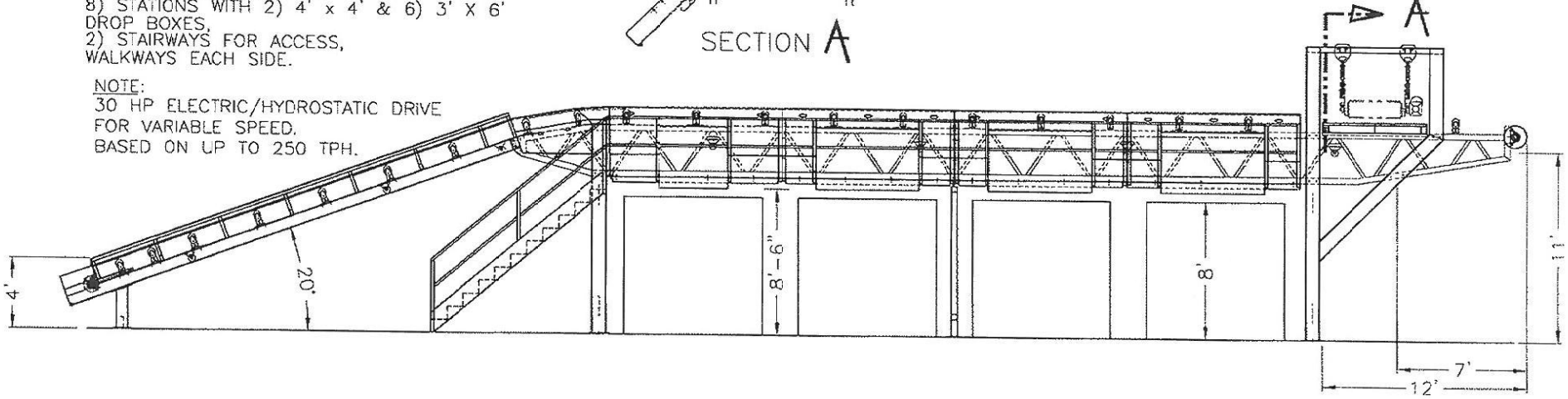
NOTE:
ASSEMBLE ON SITE.



PERMANENT CROSS BELT MAGNET W/ CHUTE FOR REJECT METAL.

60" x 85' PICKING CONVEYOR
8.5' CLEAR UNDER FRAME
8) STATIONS WITH 2) 4' x 4' & 6) 3' X 6' DROP BOXES,
2) STAIRWAYS FOR ACCESS, WALKWAYS EACH SIDE.

NOTE:
30 HP ELECTRIC/HYDROSTATIC DRIVE FOR VARIABLE SPEED.
BASED ON UP TO 250 TPH.



Construction Equipment Company
CEC
Crushing and Screening Specialists
P.O. Box 1771 Lake Grove, Oregon 97035 (503)635-4427

Drawing Title

GENERAL ARRANGEMENT
ELEVATED PICKING CONVEYOR
W/ 8) STATIONS, STAIRS and CROSS BELT MAGNET

File No.:
DA3049-15
Date: 8-7-12
Scale: NONE
Drawn By: TSEPE
App'd By: CEB